

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR 18-2945 WJ

SUBHANAH WAHHAJ,

Defendants.

UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE REPLY

Defendant Subhanah Wahhaj, by and through undersigned counsel Ryan J. Villa and Justine Fox-Young, moves the Court to extend the deadline within which to file her Reply to the Government's Response to the Motion for Court-Ordered Deposition of Witness Due to Obstruction of Witness Communication by the United States for a period of two (2) weeks, and as grounds therefore states:

1. On October 17, 2022, Defendants filed their Motion for Court-Ordered Deposition of Witness Due to Obstruction of Witness Communication by the United States. *See* Motion [Doc. 465].
2. On November 3, 2022, the Government filed its Response to Defendants' Motion. *See* Response [Doc. 501].
3. The Government informed Counsel for Defendant that they would be filing a Supplement to their Response and subsequently filed it on December 13, 2022. *See* Supplement [Doc. 548].
4. The deadline for Defendants' Reply to the Government's Response is December 27, 2022.
5. Counsel for Defendant, Mr. Ryan Villa will be out of the country December 24, 2022 to December 31, 2022.

6. Additionally, Counsel for Defendant, Ms. Justine Fox-Young will be taking time off for the holidays.

7. Accordingly, counsel requests the Court extend the deadline by two (2) weekss to January 10, 2023.

8. The undersigned counsel has contacted counsel for the United States, AUSA Kimberly Brawley, regarding this Motion. Ms. Brawley has indicated that the United States does not oppose this Motion.

WHEREFORE, Counsel for Defendants respectfully request this Court enter an Order extending the time to file their reply to January 10, 2023.

Respectfully submitted,

/s/ Ryan J. Villa

Ryan J. Villa
The Law Office of Ryan J. Villa
5501 Eagle Rock Ave NW Ste. C2
Albuquerque, NM 87113
(505) 639-5709
ryan@rjvlawfirm.com

/s/ Justine Fox-Young

Justine Fox-Young
5501 Eagle Rock Ave NE Ste C2
Albuquerque, NM 87113
(505) 796-8268
justine@foxyounglaw.com

CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2022, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the United States to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa

RYAN J. VILLA